

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Rebecca M. Zeher		CHAPTER 13
	<u>Debtor</u>	
The Money Source Inc.		
	<u>Movant</u>	
vs.		NO. 20-20538 CMB
Rebecca M. Zeher		
	<u>Respondent</u>	
Ronda J. Winnecour, Trustee		Related Documents: 40
	<u>Additional Respondent</u>	

STIPULATION AND ORDER

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, The Money Source Inc, has filed a motion for relief from stay due to delinquent mortgage payments on the mortgage secured by Debtor's real property at 569 Kelso Road, Pittsburgh, PA 15243. (Doc. 40);

WHEREAS, Debtor has filed a response opposing relief from the automatic stay (Doc. 45).

WHEREAS, the parties enter into this Stipulation to resolve the motion for relief from the automatic stay.

It is therefore Stipulated and agreed as follows:

1. The Debtor shall file an Amended Chapter 13 Plan on or before 2/18/2021, capitalizing the arrears to the trustee in the plan (Doc. 15).
2. The automatic stay is terminated as it affects the interests of the Movant with respect to Debtor's real property at 569 Kelso Road, Pittsburgh, PA 15243, provided however, that relief from stay is stayed in accordance with the conditions set forth in Paragraphs 5-8, below.
3. On a go-forward basis from and after the date of the Order approving this Stipulation, the Debtor shall timely make full plan payments to the Chapter 13 Trustee, or or before the date upon which the respective plan payment is due.

4. Time is of the essence as to all plan payments going forward.
5. For the duration of this bankruptcy case, in the event that the Chapter 13 Trustee has not received a full plan payment by the last day of the month in which the Debtor's payment is due, as indicated by the Chapter 13 Trustee's online records, then the stay provided in Paragraph 1, above, shall be vacated and the automatic stay unconditionally lifted as it affects the interests of the Movant with respect to Debtor's real property at 569 Kelso Road, Pittsburgh, PA 15243, upon the filing of a Certification of Default by Movant, without further hearing or without entry of an additional order, if Debtor has failed to cure the default within fifteen (15) days after written notice of default to Debtor's counsel.
6. Relief from the automatic stay shall be effective immediately upon conversion of Debtor's case to a case under Chapter 7.
7. In the event that the automatic stay is terminated as provided by this Order, then the Trustee shall make no further disbursements to Respondent on account of its secured claim, unless directed otherwise by further Order of Court.

Consented to by:

/s/Lawrence W. Willis, Esquire

Lawrence W. Willis, Esquire

Willis & Associates

Attorney for Debtor

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Suite 310

Pittsburgh, PA 15235

412-235-1721

ecf@westernpabankruptcy.com

/s/ James Warmbrodt, Esquire

James Warmbrodt, Esq.

On Behalf of Chapter 13 Trustee

Ronda J. Winnecour

U.S. Steel Tower

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600 Grant Street

Pittsburgh, PA 15219

412-471-5566

jwarmbrodt@chapter13trusteewpda.com

/s/ Denise Carlon, Esquire

Denise Carlon, Esquire

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701 Market Street, Suite 5000

Philadelphia, PA 19106

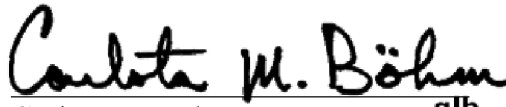
Phone: 215-825-6306, Fax: 215-825-6406

dcarlon@kmlawgroup.com

Attorney for Movant/Applicant

On this 14th day of February, 2022, it is hereby ORDERED that
the parties' Stipulation be and hereby is APPROVED and the hearing in this matter scheduled for
1/25/2022 at 10:00 a.m. is CANCELLED.

By the Court,

Handwritten signature of Carlota M. Böhm in black ink.

Carlota M. Böhm

glb

Chief United States Bankruptcy Judge

FILED

2/14/22 4:04 pm

CLERK

U.S. BANKRUPTCY

COURT - WDPA

In re:
Rebecca M Zeher
Debtor

Case No. 20-20538-CMB
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2
Date Rcvd: Feb 14, 2022

User: auto
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 16, 2022:

Recip ID	Recipient Name and Address
db	+ Rebecca M Zeher, 569 Kelso Rd, Pittsburgh, PA 15243-1509

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Feb 16, 2022

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 14, 2022 at the address(es) listed below:

Name	Email Address
Brian Nicholas	on behalf of Creditor The Money Source Inc. bnicholas@kmlawgroup.com
Denise Carlon	on behalf of Creditor The Money Source Inc. dcarlon@kmlawgroup.com
Jeffrey R. Hunt	on behalf of Creditor Municipality of Mt. Lebanon jhunt@grblaw.com
Keri P. Ebeck	on behalf of Creditor Duquesne Light Company kebeck@bernsteinlaw.com jbluemle@bernsteinlaw.com
Lawrence W. Willis	on behalf of Debtor Rebecca M Zeher ecf@westernpabankruptcy.com urfreshstr@gmail.com;willislr88866@notify.bestcase.com
Office of the United States Trustee	ustpregion03.pi.ecf@usdoj.gov

District/off: 0315-2

User: auto

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Date Rcvd: Feb 14, 2022

Form ID: pdf900

Total Noticed: 1

Ronda J. Winnecour

cmecf@chapter13trusteedpa.com

TOTAL: 7